

Jerry L. Marks (SBN 135395)
Email: jmarks@milbank.com
Aaron Renenger (SBN 222675)
Email: arenenger@milbank.com
MILBANK, TWEED, HADLEY & McCLOY LLP
601 S. Figueroa Street, 30th Floor
Los Angeles, California 90017
Telephone: (213) 892-4000
Facsimile: (213) 629-5063

David R. Gelfand (*admitted pro hac vice*)
Email: dgelfand@milbank.com
Rachel Penski Fissell (*admitted pro hac vice*)
Email: rfissell@milbank.com
MILBANK, TWEED, HADLEY & McCLOY LLP
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000
Facsimile: (212) 822-5661
*Attorneys for Defendants STA Development, LLC,
Solar Trust of America, LLC, Solar Millennium, Inc.,
CA I-10 Solar, LLC, Palo Verde Solar I, LLC,
Palo Verde Solar II, LLC, Blythe Solar Power Project
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MMR GROUP, INC.,
MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC,

Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
SOLAR MILLENNIUM, INC., CA I-10
SOLAR, LLC, PALO VERDE SOLAR I, LLC,
PALO VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC

Defendants.

Case No. 3:11-cv-01521-EMC

**FOURTH STIPULATION TO
EXTEND DEFENDANTS' TIME TO
RESPOND TO AMENDED
COMPLAINT AND [PROPOSED]
ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request that the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by two weeks from December 5, 2011 to December 19, 2011.

On November 4th and 14th, the parties requested, and this Court later granted, a one-week extension of time for the STAD Defendants to respond to the Amended Complaint because the parties were in advanced stages of settlement discussions. On November 22, 2011, this Court granted a third extension for two weeks extending the time for the STAD Defendants to respond from November 21 to December 5 due to the Thanksgiving holiday and continued progress in settlement negotiations. That progress has continued and the parties remain hopeful that they will execute a settlement agreement forthwith. The parties therefore request another two-week extension of the time for the STAD Defendants to respond to the Amended Complaint. The parties’ request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants’ time to respond to the Amended Complaint by two weeks from December 5 to December 19, 2011.

1 Dated: December 1, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Aaron Renenger

3 Jerry L. Marks (SBN 135395)
4 Aaron Renenger (SBN 222675)
5 601 S. Figueroa Street, 30th Floor
6 Los Angeles, California 90017
7 Telephone: (213) 892-4000
8 Facsimile: (213) 629-5063

9 David R. Gelfand (*admitted pro hac vice*)
10 Rachel Penski Fissell (*admitted pro hac vice*)
11 1 Chase Manhattan Plaza
12 New York, NY 10005
13 Telephone: (212) 530-5000
14 Facsimile: (212) 822-5661

15 *Attorneys for Defendants STA Development, LLC,*
16 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
17 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and*
21 *Blythe Solar Power Project Unit 4, LLC*

22 Dated: December 1, 2011

**WATT, TIEDER, HOFFAR
& FITZGERALD, LLP**

23 By: /s/ Nicholas A. Merrell

24 Bennett J. Lee (CA Bar No. 230482)
25 Nicholas A. Merrell (CA Bar No. 240795)
26 Regina A. Verducci (CA Bar No. 264996)
27 333 Bush Street, Suite 1500
28 San Francisco, CA 94104
Telephone: 415-623-7000
Facsimile: 415-623-7001

*Attorneys for Plaintiffs MMR Group, Inc., MMR Power
Solutions, LLC and Southwestern Power Group II, LLC*

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: _____

UNITED STATES DISTRICT COURT JUDGE